

Comments on July 2014 draft permit for Sand Island WWTP:

1. Compliance schedule for enterococcus:

- a) The permit needs to make clear that the compliance schedule and interim limit only apply to the new monthly geometric mean EL and that the permittee must comply with the maximum daily EL immediately.
- b) The compliance schedule must include the 2022 milestone from the Consent Decree and must require compliance no later than the earlier compliance deadline in the Consent Decree (i.e. 2035, not 2038). Please provide the justification for the length of the schedule. Was the length based on a proposal by the permittee? If not, what information was used to determine the schedule? Since the facility already has disinfection facilities onsite, allowing them to take the full length of the consent decree schedule to upgrade their facility to meet the monthly geometric mean effluent limit may not meet the requirements of 40 CFR 122.47, especially since they may just have to expand or optimize their current disinfection facilities.
- c) Recommend the interim limit for enterococcus be calculated based on the 95th percentile, consistent with how the interim limits for BOD and TSS were calculated in the Consent Decree.

2. Why were there only 3 data points for ammonia? Could more effluent data be obtained in order to better calculate a more representative performance-based effluent limit?

3. The dieldrin average annual limit is more stringent than the previous permit and the fact sheet found on page 28 that the permittee may not be able to immediately comply with this limit. Has the permittee requested a compliance schedule for this particular limit? Also, the fact sheet states the permittee may not be able to comply with the new annual average DDT limit. Has the permit requested a compliance schedule for this limit? Recommend strengthening the fact sheet here.

4. Page 4 of permit: ammonia EL measurement frequency and sample type are missing.

5. Page 4, footnotes 6 and 7 need to be clarified. It appears that footnote 6 allows compliance to be determined by either a daily maximum or a daily geometric mean. This should be a single sample maximum, consistent with Honouliuli. Also, recommend removal of footnote 7, as unnecessary.

6. Fact sheet, page 6, footnotes 3 and 5 of Table F-2: Please change to:

³ Effluent limitations contained in the previous permit ~~and effective through December 2010. These effluent limitations were replaced with interim effluent limitations in the December 2010 Consent Decree for the United States of America v the City and County of Honolulu (2010 Consent Decree).~~

⁵ Interim effluent limitations contained in the 2010 Consent Decree. Interim effluent limitations are applicable until ~~deadlines established the facility is in compliance with secondary treatment standards and became effective~~ in December 2010 Consent Decree.

7. Fact sheet, page 6, Table F-3: there appears to be a typo, in that “average daily” should be “maximum daily” in header under both effluent limitation and reported data. Is that correct?

8. Fact sheet, page 8 under section 7. Please remove the last sentence in the second paragraph: ~~“The 2010 Consent Decree supersedes requirements in the draft permit.”~~
9. Fact sheet, page 12: please remove paragraph before the WQBELs section that begins with, “Thus, technology-based effluent limitations based on secondary treatment...” Could replace with, “The Consent Decree requirements for BOD and TSS supersede the applicable TBELs until the deadline established in the Consent Decree.”
10. Fact sheet, pages 18-19, RPA table should include columns for number of samples and applied dilution factor, if applicable, in order for transparency.
11. Fact sheet, page 31 should cite the specific portion of the CFR that discusses the criteria applicable to Hawaii.
12. Fact sheet, page 33 and 34 state the highest monthly geomean for enterococcus was 2,460,035 cfu/100ml. It should be made clear when this value was reported (before or after UV). This seems clear in the paragraph on page 33, but not on page 34.
13. Fact sheet, page 39, Table F-9, footnote 3 should not be a geometric mean. It is referenced in the proposed EL for enterococcus and this is a maximum daily limit, not a geomean.
14. Fact sheet, page 55: please remove sentence regarding urban area pretreatment requirements being removed, as kept in permit.